

BLOOD HURST & O' REARDON, LLP

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13 Attorneys for Plaintiffs

14  
15 **UNITED STATES DISTRICT COURT**  
16 **SOUTHERN DISTRICT OF CALIFORNIA**

17 HEATHER TURREY, et al.,  
18 Plaintiffs,  
19 v.  
20 VERVENT, INC., etc., et al.,  
21 Defendants.

Case No. 3:20-cv-00697-DMS-AHG  
**CLASS ACTION**

**DECLARATION OF JORDAN  
HERNANDEZ IN SUPPORT OF  
MOTION FOR CLASS  
REPRESENTATIVE SERVICE  
AWARD**

**Date: August 16, 2024**  
**Time: 1:00 p.m.**

District Judge Dana M. Sabraw  
Courtroom T3A, 13th Fl. (Carter-Keep)  
Magistrate Judge Allison H. Goddard  
Chambers Room 3B, (Schwartz)

Complaint Filed: April 10, 2020  
Trial Date: June 8, 2023

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1 I, JORDAN HERNANDEZ, declare:

2 1. I am a named plaintiff and Class Representative in the case called *Turrey*  
3 *v. Vervent, Inc.*, S.D. Cal. No. 3:20-cv-00697-DMS-AHG. I have personal knowledge  
4 of the facts stated below and, if called upon to testify, would be competent to do so.

5 2. I was designated as a Class Representative in the Amended Motion for  
6 Class Certification and was included in a declaration in support of the motion to  
7 appoint me as the Class Representative in this case. *See* Dkt. No. 143-2. Class  
8 certification was granted, and I was appointed a class representative for the Class  
9 RICO Claim, the FDCPA subclass, the RFDCPA subclass and the Class UCL and  
10 negligent misrepresentation claims, by this Court on January 11, 2023. *See* Dkt. No.  
11 151

12 3. I am a resident of the State of California. I volunteered to be a plaintiff  
13 and to represent other borrowers in this class action because I believe it is wrong for  
14 companies to service and collect on fraudulent loan products. I understand that I was  
15 appointed by the Court to be the representative of the class, and it is my duty to act in  
16 the best interest of the class and to not put my interests ahead of theirs in this case. I  
17 believe that I have carried out this duty.

18 4. I retained my attorneys in September 2022 and have kept in contact with  
19 them and stayed informed on the progress of the case. I have answered all of my  
20 attorneys' questions regarding my experience with PEAKS. From the time I agreed  
21 to act as a class representative, I understood that trial was quickly approaching and  
22 that I would have to make myself available very quickly to meet the discovery and  
23 trial schedule.

24 5. After I was appointed as the Class Representative by the Court, I have  
25 spent a lot of time and effort on this case. I spoke with my attorneys numerous times  
26 about my experience with PEAKS, Vervent Inc., and ITT Technical School. I've also  
27 spoken to them regularly about Defendants' discovery requests, my deposition, the  
28 case in general, and the jury trial.

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1           6. I reviewed and spoke with my attorneys about the interrogatories and  
2 requests for documents that Defendants served. I answered all the questions to the  
3 best of my knowledge and searched my home, emails, and other sources for any  
4 documentation related to my PEAKS loan. I sent my attorneys account statements and  
5 documents that were in my possession. These documents were eventually used during  
6 the trial. After the answers to the interrogatories and the responses to the request for  
7 documents were prepared by my attorneys, I reviewed them to make sure they were  
8 accurate. I signed a verification of my interrogatory answers swearing under the  
9 penalty of perjury that they were truthful to the best of my knowledge.

10           7. In preparing for my deposition, I had several meetings and phone calls  
11 with my attorneys where they asked me detailed questions about my background, my  
12 education history, and the reasons why I took out a PEAKS loan. I re-read the  
13 complaints and my previous interrogatories and request for production of documents  
14 answers. During the meetings we also went through a mock deposition where they  
15 would ask questions as if they were Defendants' attorneys. On October 15, 2022, I  
16 attended the deposition. I had to answer all questions from Premier's attorneys under  
17 oath and subject to the penalty of perjury.

18           8. On March 22, 2023, I attended a settlement conference on Zoom with  
19 Magistrate Judge Allison Goddard. In order to attend, I had to take time off work,  
20 however it was important for me to attend in order to demonstrate my commitment  
21 and involvement in the case. I spoke to my attorneys beforehand in preparation for  
22 the settlement conference and was debriefed by them afterwards.

23           9. Prior to trial, I had several meetings to prepare to testify and discuss how  
24 the trial would work. I immersed myself in the case to ensure I was prepared to answer  
25 any questions from Defendants' attorneys. I re-read the complaints, my answers to  
26 interrogatories and requests for production of documents, and my deposition  
27 transcript several times to ensure my trial testimony would be accurate and truthful. I  
28

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1 was very nervous to testify in front of everyone at the trial. I had never testified at a  
2 trial before but felt strongly about the case.

3 10. On June 11, 2023, I traveled to San Diego from my home in San Pedro,  
4 California to prepare for, attend, and testify at the trial. I attended the trial on June  
5 12th through June 14th, 2023. I spoke with my attorneys regularly throughout the trial  
6 to keep up to date about the proceedings.

7 11. On June 13, 2023, I was called to testify at the trial. I had to return to  
8 Court the next day to continue my testimony. I was subjected to several rounds of  
9 questioning by my attorney and by Defendant's attorney. Defendant's attorney cross-  
10 examined me for hours. I answered everything to the best of my knowledge. I continue  
11 to communicate with my attorneys to get updates on the motions brought since the  
12 trial and the overall progress of the case. I remain committed to the case and will stay  
13 active and involved.

14 I declare under penalty of perjury that the foregoing is true and correct.  
15 Executed on June 19, 2024, at Torrance, California.

  
Jordan Hernandez (Jun 19, 2024 12:56 PDT)

JORDAN HERNANDEZ

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Electronic Mail Notice List.

I certify under penalty of perjury that the foregoing is true and correct. Executed on June 27, 2024.

*s/ Timothy G. Blood*

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TIMOTHY G. BLOOD

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